

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**RYAN FARACE and  
JOSEPH FARACE**

**Defendants.**

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**CRIMINAL NO. LKG-21-294**

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**CONSENT MOTION TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

Comes now the United States of America, by and through its counsel, Erek L. Barron, the United States Attorney for the District of Maryland, and Coreen Mao, Assistant United States Attorney for said district, and with the consent of counsel for Defendant Joseph Farace, respectfully submits this Consent Motion to Exclude Time Under the Speedy Trial Act.

1. On August 3, 2021, a one-count indictment was returned against the Defendants, Ryan Farace and Joseph Farace, for Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h). ECF No. 1.

2. On October 6 (Joseph) and October 8 (Ryan), 2021, the Defendants had their initial appearances and Ryan Farace further entered a plea of not guilty. ECF Nos. 11, 17, 18. Subsequently, on September 8, 2022, Ryan Farace pled guilty to Count One of the Indictment. ECF No. 52. Defendant Ryan Farace's sentencing is set for January 5, 2023.

3. The most recent Speedy Trial Act motion filed on October 7, 2022 confirmed that voluminous discovery had been provided and sought the exclusion of time through October 28, 2022 for the parties to determine if the case could be resolved short of a trial. ECF No. 58. Judge Blake, who was then presiding over the case, approved the request for additional time and ordered that time through October 28, 2022 be excluded from computing the time within which

trial shall commence under the Speedy Trial Act. ECF No. 60.

4. The Speedy Trial Act provides that the trial of the defendant shall commence within seventy days “from the filing date (and making public) of the information or indictment, or from the date the defendant has appeared before a judicial officer of the court in which such charge is pending, whichever date occurs last.” 18 U.S.C. § 3161(c)(1). However, pursuant to 18 U.S.C. § 3161(h)(7)(A), any delay resulting from a continuance is excluded for speedy trial purposes if the continuance is based on a finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

5. The circumstances of this case require a continuance under the Speedy Trial Act. The parties continue to be engaged in discussions on a potential pre-trial resolution, including a plea offer extended by the Government to Defendant Joseph Farace, which remains under consideration. Under these circumstances, the ends of justice served by continuing the Speedy Trial Act clock outweigh the best interests of the public and the defendant in a speedy trial.

6. Counsel for Defendant Joseph Farace consents to this motion.

WHEREFORE, with the consent of counsel for Defendant Joseph Farace and pursuant to 18 U.S.C. § 3161(h)(7)(A), counsel for the Government requests that the Court exclude all time from October 29, 2022 through December 12, 2022, under the Speedy Trial Act.

Respectfully submitted,

Erek L. Barron  
United States Attorney

/s/ \_\_\_\_\_  
Coreen Mao  
Assistant United States Attorney  
United States Attorney’s Office  
District of Maryland